

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
VANESSA WILLIAMS and KORY TURNER,  
individually and on behalf of all persons similarly  
situated,

Plaintiffs,

vs.

EQUITABLE ACCEPTANCE CORPORATION,  
SLF CENTER, LLC, INTEGRA STUDENT  
SOLUTIONS, LLC, JEFFREY D. HENN, and TERESA  
HENN,

Defendants.  
-----X

**DECLARATION OF  
DANIELLE TARANTOLO**

No. 18-CV-07537 (NRB)

Danielle F. Tarantolo declares under penalty of perjury that the following is true and correct:

1. I am a Co-Director of New York Legal Assistance Group’s Special Litigation Unit, co-counsel for Plaintiffs in the above-captioned action.
2. Attached hereto as **Exhibit 1** is a true and correct copy of a May 22, 2020 press release from the office of the New York State Attorney General, entitled “Attorney General James Delivers Relief to Student Loan Borrowers as New Yorkers Continue to Struggle Financially from Coronavirus,” available at <https://ag.ny.gov/press-release/2020/attorney-general-james-delivers-relief-student-loan-borrowers-new-yorkers>, and accessed September 17, 2020.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the document Bates-stamped EAC-0039449, an email from Jeffrey Henn to Bruce Bellmare, dated July 14, 2016.
4. Attached hereto as **Exhibit 3** is a true and correct copy of the document Bates-

stamped EAC-0039361, an email from Jeffrey Henn to Bruce Bellmare, dated March 8, 2017.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the document Bates-stamped EAC-0039381, an email from Jeffrey Henn to Bruce Bellmare, dated February 21, 2017.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the document Bates-stamped EAC-0039357, an email from Phillip Toth to Jeffrey Henn, Bruce Bellmare, and Jeffrey Radov, dated March 8, 2017.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the document Bates-stamped EAC-0039009, an email from Jeffrey Henn to Bruce Bellmare, dated February 7, 2018.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the document Bates-stamped EAC-0056738, an email from Daryl Soeder to, among others, Bruce Bellmare, dated February 1, 2016.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the document Bates-stamped EAC-0056739, which was attached to the document Bates-stamped EAC-0056738 (Exhibit 7).

10. When de-duplicated, the spreadsheet Bates-stamped EAC-0056739 (Exhibit 8) contains the contact information for 382 individual New York Borrowers financed through EAC.

11. Attached hereto as **Exhibit 9** is a true and correct copy of an August 8, 2019 press release from the office of the New York State Attorney General, entitled, “Attorney General James Holds Lender Responsible for Ripping Off Student Borrowers,” available at <https://ag.ny.gov/press-release/2019/attorney-general-james-holds-lender-responsible-ripping-student-borrowers>, and accessed September 17, 2020.

Dated: September 18, 2020  
New York, New York

/s/ Danielle F. Tarantolo  
Danielle F. Tarantolo